

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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IN RE: NEW ENGLAND COMPOUNDING  
PHARMACY, INC.  
PRODUCTS LIABILITY LITIGATION

v.

MDL No: 1:13-md-2419-RWZ

This Document Relates to:

Kennedy, et al. v. Unifirst Corporation, et al.

No: 1:13-cv-13227-RWZ

Musselwhite v. Unifirst Corporation, et al.

No: 1:13-cv-13228 -RWZ

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**JOINT MOTION FOR ORDER TO SET BRIEFING SCHEDULE**

The defendants, Advanced Pain & Anesthesia Consultants, PC d/b/a APAC Centers for Pain Management and Randolph Y. Chang, M.D., (hereinafter the “APAC Defendants”) and the Plaintiffs’ Steering Committee (“PSC”) have conferred in order to establish a briefing schedule for the APAC Defendants’ Response to Plaintiffs’ Complaints in the above referenced dockets.

As a result, the parties have agreed to the following briefing schedule:

1. The APAC Defendants will file its Response to the Complaints no later than **April 14, 2014;**
2. The PSC will file its reply to the Response to Complaints filed by the APAC Defendants no later than **May 14, 2014.**
3. The APAC Defendants will file a Reply to the PSC’s Response no later than **May 28, 2014;** and (limited to 5 pages)
4. If necessary, the PSC may file a sur-reply to the Reply to the PSC’s Opposition to the Motion to Dismiss filed by the APAC Defendants no later than **June 5, 2014.** (limited to 5 pages)

The parties respectfully request that the Court enter the attached order to formalize the above-described revised briefing schedule.<sup>1</sup> In addition, pursuant to Local Rule 7.1(d), the parties request that the Court reserve a date for oral argument.

Respectfully Submitted

/s/ Kimberly A. Dougherty

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<sup>1</sup> The parties agree that further extensions may be necessary depending upon the timing, nature and extent of Defendants production of documents in response to the PSC's Subpoena. If necessary, a joint motion for a revised briefing schedule will be filed with this Court.

*Federal/State Liaison*

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*Plaintiffs' Steering Committee*

The Defendants,

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d/b/a APAC Centers for Pain Management and  
Randolph Y. Chang, M.D.

By their attorney,

/s/ Anthony E. Abeln

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I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on **March 31, 2014**

/s/ Anthony E. Abeln

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